

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	Docket No. 06-0187
Grant Awards From Digital Divide)	
Elimination Infrastructure Fund)	

VERIZON AVENUE CORPORATION'S VERIFIED INITIAL COMMENTS

Pursuant to the schedule set by the Administrative Law Judge ("ALJ") at the May 18, 2006 Status Hearing ("Status"), as modified by the subsequent Notice dated June 1, 2006, Verizon Avenue Corporation ("Verizon"), by and through its attorneys, hereby submits its verified initial comments on the March 18, 2006 Illinois Commerce Commission Telecommunications Division Staff Report ("Staff Report").

I. Introduction and Standard of Review

Section 13-301.3 of the Illinois Public Utilities Act (220 ILCS 5/13-301.3) created a Digital Divide Elimination Infrastructure Fund ("DDEIF") for the exclusive use of the Illinois Commerce Commission ("Commission") to fund the construction of high-speed data transmission facilities in the state. The fund appropriations (in the form of grants) are determined by the Commission, based on information received through a Request for Grant Proposal ("RFGP") process. This process, as well as the limitations and obligations related thereto, is dictated by 83 Ill. Admin. Code Part 759.

This is the first time the Commission has undertaken the review of applications for DDEIF grants, making this a case of first impression. On the one hand, the Commission is not

constrained by prior orders on the subject. On the other, the Commission has no prior guidance for interpreting the legal standards for selection of applications. While time is of the essence given that the summer construction season is ongoing, the Commission must be mindful of the need to conduct a thorough and fair review of the applications, particularly given the inevitable effect that its order in this case will have on future DDEIF proceedings.

In particular, the Commission's application of the criteria set forth in 220 ILCS 5/13-301.3 and the associated implementing rules found in 83 Ill. Admin. Code Part 759 will guide the Commission's evaluation of subsequent DDEIF grant applications. Perhaps most critically, the Commission must ensure that it employs consistent standards for determining "eligible areas" under 220 ILCS 5/13-301.3(b) and 83 Ill. Admin. Code. § 759.230(a), and for the selection of grant recipients under 200 ILCS 5/13-301.3(c) and 83 Ill. Admin. Code § 759.320. Of paramount importance in this analysis is the interpretation of the term "under-provided" as used in 220 ILCS 5/13-301.3(b) and 83 Ill. Admin. Code § 759.230(a).

While Verizon commends Staff for its review and analysis of the voluminous DDEIF grant applications in a very short period of time, and although Verizon does not oppose the applications for which Staff has recommended approval, Verizon respectfully submits that adoption of the Staff Report, as currently drafted, will result in inconsistent application of the above-referenced criteria. As detailed below, several DDEIF grant applications for which Staff has recommended approval propose installing high-speed data transmission facilities in areas of the state already served by *multiple* providers of such services. Yet, the Staff Report

recommends rejecting Verizon's applications¹ because *one* alternative broadband provider exists in each of the areas in which Verizon applied for grants. (*See* Staff Report at 12). A consistent application of standards and analysis in determining what constitutes an "under-provided" area under 220 ILCS 5/13-301.3(b) and 83 Ill. Admin. Code. § 759.230(a) would require that the areas at issue in Verizon's applications similarly be deemed "under-provided" (or "underserved," the term used in the Staff Report). Indeed, as discussed below, the areas at issue in the Verizon applications are more severely "under-provided" or "underserved" than those covered by the proposals from Clearwave Communications LLC d/b/a Delta Communications ("Delta"), Heartland Communications Internet Services, Inc. ("Heartland"), Illinois Rural Electric Cooperative ("IREC"), and USA Broadband-EI, LLC ("USA Broadband").

Staff also recommended approval of at least one DDEIF grant application that included the use of facilities already in progress by the grant applicant. (Staff Report at 35-36). Yet, Staff recommended rejection of Verizon's applications because Verizon had already completed the construction projects for which it sought DDEIF grant awards. (*See* Staff Report at 12). Again, a consistent application of standards as to "retroactive" funding of grant projects would require that Verizon's applications not be rejected on this basis. Indeed, to reject applications simply because the applicant has invested its own funds up front with the hope of reimbursement from the DDEIF down the road would have a chilling effect on construction, which is contrary to the very purpose of the Commission rules implementing the DDEIF grant program: "to fund the construction of high-speed data transmission facilities in the State" (*See* 83 Ill. Admin. Code

¹ Verizon submitted separate funding requests for its Chatham, Highland and Rantoul projects.

§ 759.110).

II. Discussion

On October 7, 2005, the Commission issued the RFGP for the purpose of soliciting applications for grant awards from the Illinois Digital Divide Fund to “help fund the construction of high speed data transmission facilities in eligible areas of Illinois” with a deadline of December 15, 2005 for submissions. (See RFGP at 2). Verizon’s timely DDEIF applications sought grants for the provision of high-speed data transmission service to three discrete areas: Chatham, Highland and Rantoul. (Staff Report at 10). Verizon contends that these three areas satisfy the criteria set forth in the RFGP, the applicable statutes and the relevant administrative rules. Had the Staff Report applied those criteria consistently as to all applicants, Staff would have recommended approval of Verizon’s requested DDEIF grant awards.

A. Verizon’s Applications Meet the Applicable “Under-Provided”/ “Underserved” Criteria To a Greater Degree Than Some Applicants for Which Staff Recommended Approval

The Staff Report recommended approval of several grant applications based on the rural nature of the areas at issue, and because those areas were “underserved.” However, based on these criteria, the three areas covered by Verizon’s DDEIF applications are more rural in nature, and more “under-provided”/“underserved” than some of the areas that Staff has recommended for a DDEIF grant award. Verizon focused its review on the Delta, Heartland, IREC and USA Broadband applications, which confirmed that the areas covered by Verizon’s DDEIF grant applications were indeed more rural and under-provided/underserved than those at issue in the

PUBLIC VERSION

applications of these other providers. Yet, the Staff Report recommended approval of the Delta, Heartland, IREC and USA Broadband applications, but denial of Verizon's.

Several communities that Staff recommended for approval after finding that they were rural and under-provided/underserved are actually much larger and more economically diverse than what one would typically describe as rural. They are also likely already to have multiple competitive providers of high-speed data transmission services. Among the communities that the Staff Report apparently deemed to qualify as rural and under-provided/underserved are

[illegible]

CONFIDENTIAL*** These are not communities that the average Illinois resident would deem to be rural. Nor do they appear to be under-provided. Based on Verizon's research, Carbondale has six alternative providers (Clearwave, Verizon, MediaCom, MyChoice, Local Link, Neon DSL, and ShawneeLink), Marion has seven (Clearwave, Verizon, MediaCom, MyChoice, Local Link, Neon DSL, and ShawneeLink); Bloomington has seven (Verizon, Insight Cable, Comcast, Charter Communications, Clearwave, Insight Media, and MediaCom) and Champaign is serviced by at least one broadband Satellite company (HughesNet).

Verizon's DDEIF grant applications were also painstakingly specific in their scope, while other applications were vague, and even seemingly reluctant to be specific. For example, the Heartland application only identified counties (Staff Report at 21), some of which encompass the same communities as those contained in the successful application of ***BEGIN

CONFIDENTIAL XX

END CONFIDENTIAL*** Thus, while the Staff Report deemed these communities sufficiently under-provided/under-served to warrant recommending approval of these two DDEIF grant applications, the result is that some areas will now have multiple providers, whose entry into the market was subsidized by the DDEIF. This seems to be something Staff intended to avoid. For example, the Staff Report makes explicit note of the fact that IREC’s proposal “covers an area of Illinois not addressed by any other grant proposal.” (Staff Report at 24).

Like Heartland, IREC failed to identify specific towns in its application, instead listing six counties that contain over 50 communities. (Staff Report at 22). The dearth of specific information on the specific areas to be served indicates that the business plans for those projects are either incomplete, or will inevitably wind up serving areas that may not qualify as under-provided/underserved.

Delta is the only one of the four applicants discussed here that provided city-level detail in its proposal. Interestingly enough, *****BEGIN CONFIDENTIAL XXXXXXXXXXXXX END CONFIDENTIAL***** cities that Delta proposes to serve have higher population densities than the average of the three cities that Verizon included in its proposal. (See Delta Application at 26; Staff Report at 11).

Lastly, the Staff Report explicitly acknowledges that “Verizon Avenue has developed a comprehensive program to bring high speed internet service to the underserved communities of Chatham, Highland and Rantoul.” (Staff Report at 10). Staff also found that “Verizon Avenue is without question well-qualified to construct facilities of the type sought.” Staff concluded that the applications from Delta, Heartland, IREC, and USA Broadband qualified for grant awards.

Given Staff's reference to Chatham, Highland, and Rantoul as being "underserved" and to Verizon being "well-qualified," Verizon's projects in Chatham, Highland, and Rantoul should have fallen into the same category. When compared to a number of applications for which Staff has recommended approval, Verizon's application exceeds in meeting the criteria set forth for the DDEIF grant process.

B. Given That Multiple Alternative Providers Exist in Areas Covered by Several Applications for Which Staff Recommends Approval, The Staff Report Unfairly Leverages the Existence of a Single Alternative Provider to Recommend Denial of Verizon's Applications

The Staff Report concludes that the Commission should deny Verizon's grant request because "[f]or each of the proposals, an alternate broadband provider exists in the form of Insight or Charter Cable Companies." (Staff Report at 12). Concluding that one alternative broadband provider in the marketplace serves as the appropriate barometer of a competitive market for purposes of this docket is unfair and illogical. Moreover, a review of several applications that Staff recommended for approval in areas where there is already more than one alternative provider reveals that there is no consistency to Staff's use of this standard, and that Verizon has been detrimentally impacted by the arbitrary application of an erratic standard.

Staff recommends that the Commission award nine DDEIF grants. (Staff Report at 9). In several instances, Staff acknowledged that those applications covered areas already having two or more providers of high-speed data transmission services. After reviewing the confidential version of the Staff Report, Verizon reviewed five of these nine underlying DDEIF grant applications to determine whether the proposals served areas where multiple alternate providers

already existed.

Delta identified *****BEGIN CONFIDENTIAL XXXXXX END CONFIDENTIAL***** that it intends to service with its grant monies. (Delta Application at 26). In 31 out of 32 of these communities, there is already at least one provider of broadband services. (Delta Application, Table 2 at 28-31) A majority of these communities *****BEGIN CONFIDENTIAL XXXXXXXXXXXX END CONFIDENTIAL***** already have two or more alternative providers of broadband services. (Delta Application, Tables 2 and 2.2 at 28-34). Staff’s recommended approval of Delta’s application despite the existence of several alternate providers of high-speed data transmission services in the relevant areas is inconsistent with Staff’s recommended rejection of Verizon’s applications on the basis of the existence of a *single* alternate provider in the three affected areas.

IREC’s application identifies *five* alternative providers in the territories covered by its application – Winco, Adams Network, Cass Communications, Mediacom and Verizon. (Staff Report at 22). Inexplicably, the Staff Report concludes, without analysis, that “IREC’s proposal covers an area of Illinois not addressed by any other grant proposal, and appears to be underserved.” (*Id.* at 24).

The City of Sullivan’s application discloses the existence of two alternative providers within the territory it wishes to serve, a wireless internet provider offering broadband service, and a CATV provider. (Staff Report at 32). USA Broadband cites at least three other providers operating in the territory it proposes to serve in its grant application, and states that it expects to see other wireless broadband providers enter select areas of the state. (*Id.* at 38). Yet, Staff has

recommended that the Commission approve these applications as meeting the under-provided/underserved criterion.² (Staff Report at 35-36; 39).

Heartland's application is somewhat misleading when it comes to identifying the level of competition in its proposed implementation areas. Although Heartland states that "for the most part, there is no broadband provider of high speed internet services" (Staff Report at 20), this seems to conflict with its DDEIF grant application, which focuses on voice services. There, Heartland states that its proposal will bring *****BEGIN CONFIDENTIAL** XXXXXXXX
XX
XX **END CONFIDENTIAL*****
(See Heartland Application at Section D; emphasis added). Heartland seems to studiously avoid defining the existing broadband market, leaving the Commission to wonder whether Heartland's true intent is to expand its CLEC business (Aero), rather than to offer broadband services.

Based on the above review of a number of applications for which Staff has recommended approval, it is puzzling that Staff applied such a disparate view of the criteria for deeming an area under-provided/underserved to the Verizon applications. The Commission should consistently apply the same standard to all applicants. If it does, it must find that Verizon's applications also would serve under-provided/underserved areas, as required by the RFGP, 220 ILCS 5/13-301.3(b) and 83 Ill. Admin. Code. § 759.230(a).

C. The Staff Report Applies Staff's "Retroactive Funding" Concern Inconsistently

² Staff did express some concern about the existence of the two alternatives in the Sullivan project territory, it opted to recommend approval because it believed Sullivan had "done an adequate job" of demonstrating that community needs had outpaced the existing providers' abilities to serve the community. (Staff Report at 35).

As noted in Part I above, the Staff Report recommends denial of the Verizon applications in part because “Staff is also not convinced that it is sound policy to retroactively fund projects that are already completed.” (Staff Report at 12). Verizon submits that public policy supports permitting applicants to seek DDEIF grant awards for projects that are *already underway*.

As discussed above, applicants who might otherwise have embarked immediately on projects that would bring new high-speed data transmission facilities to underserved areas of the state due to having a reasonable hope of obtaining DDEIF funding assistance along the way might delay such efforts in order to pursue DDEIF grants and obtain a decision thereon before expending resources even on the planning stages of such projects. This would be anathema to the fundamental purpose of the DDEIF, which is to bring such services to underserved areas now, as opposed to years down the road. As Lieutenant Governor Quinn noted at p. 1 of his April 26, 2006 reply comments on process, “[m]y primary concern in this proceeding is that the [DDEIF] grants are awarded as quickly as possible.” It would be contrary to the public policy embodied in the DDEIF statute and associated rules to punish providers who embark on ambitious projects sooner, rather than later.

In addition, the RFGP contemplates a “spend first, reimburse afterwards” scenario. It states that “[g]rants must be used to reimburse costs incurred in constructing high-speed data transmission facilities.” (See RFGP at 3). This means the investment dollars need to be expended before grant payments can be made, which is precisely the situation that Verizon was in when Verizon submitted its DDEIF grant application. Similarly, 83 Ill. Admin. Code Part 759 – which specifies the procedures to be followed for the DDEIF grant award process – sets forth

a grant disbursement schedule requiring that “[w]hen a grantee can demonstrate through its reports to the Commission, as specified in Section 759.340,³ *that the grantee has expended 25%* of the total eligible project costs, the Commission shall release 25% of the grant award to the grantee.” (83 Ill. Admin. Code § 759.330(d)(1); emphasis added). Parallel language providing that 50% of the grant award shall be released at 75% completion, and the balance of the grant award at 100% completion appears at 83 Ill. Admin. Code § 759.330(d)(2) and (3). In other words, the grant awards are plainly not intended to issue prior to the inception of work on the project.

Verizon also reminds the Commission that the RFGP was a work in progress for nearly a year. Representatives from Verizon and Staff discussed the anticipated timing of the issuance of the RFGP on several occasions. Based on those discussions, Verizon had every belief that the RFGP would issue prior to the completion of the projects in Chatham, Highland, and Rantoul. Verizon therefore proceeded to commence its work on those projects so that the residents in the underserved communities could realize the benefits sooner rather than later. Unfortunately, the RFGP was delayed, and Verizon completed work before the application process ended. The Commission should not punish Verizon for timing issues that were out of its control.

Finally, the Commission should recognize that Staff recommended approval of the City of Sullivan’s proposal, and that proposal relies on construction that had already been completed.

For example, the “Summary of Proposal” indicates that Sullivan *****BEGIN CONFIDENTIAL**
XX

³ Ill. Admin. Code § 759.340 requires quarterly reporting of actual expenditures. The reporting format is to be determined by the Commission, which has not been done to date.

XX

XX

END CONFIDENTIAL*** (See City of Sullivan Application at 3; emphasis added). The City

of Sullivan’s application continues on to explain that grant-sponsored work will be *****BEGIN**

CONFIDENTIAL XXX

XXXXXXXXXX **END CONFIDENTIAL***** (*Id.* at 9). There is no cause to reject Verizon’s

DDEIF grant application due to retroactive funding concerns when the City of Sullivan’s

application was granted under similar circumstances, particularly given that Verizon’s total

DDEIF grant request was less than the award granted to the City of Sullivan.

D. The Bases for the Staff Report’s Recommended Denial of Verizon’s Applications Are Inconsistent with the Bases for the Recommended Denial of Other Applications

The Staff Report recommended denial of five other applications in addition to Verizon’s. (Staff Report at 2-15). Staff apparently recommended denial of the applications from the cities of Princeton and Rock Falls because they proposed to serve areas where multiple alternate high-speed data transmission providers were already active in the relevant markets. (Staff Report at 6-7). This is not the case with Verizon. Staff recommended two other denials – Sincsurf, Inc. and Yamaha of Southern Illinois – because those applicants failed to provide the details required by the RFGP. (Staff Report at 10; 14-15). Verizon’s application does not suffer from this infirmity. Staff rejected the last applicant – Aero – because Staff was recommending that its partner (Highland) receive approximately \$1 million in DDEIF funds. No Verizon partner applied for a DDEIF grant.

In sum, Verizon is the only DDEIF grant applicant rejected by Staff that provided a thorough, complete response to the RFGP, proposed to implement in an underserved region, actually proceeded with its projects (in the spirit of the statute) even before funding was approved, and is a qualified business to perform the work. Staff's inconsistent application of its rejection criteria is further cause for the Commission to decline to follow Staff's recommendation.

E. There Is Sufficient Funding Available to Grant Verizon's Request

There are ample DDEIF dollars available to award Verizon grant monies without jeopardizing the other applicants' awards. It is Verizon's understanding that the total amount to be distributed under this RFGP is \$5M, with additional DDEIF funds to be disbursed later this year. The amount recommended by Staff to the nine applicants was \$4,611,083. (Staff Report at 39). Verizon's total request is *****BEGIN CONFIDENTIAL XXXXXXXXXXXXXXXX END CONFIDENTIAL***** (Confidential Staff Report at 10). It is fair to conclude that the Commission can fund the Verizon projects without jeopardizing the other grants recommended for approval in the Staff Report.

PUBLIC VERSION

III. Conclusion

For all the reasons discussed above, the Commission should decline to adopt the Staff Report's recommendations as to Verizon Avenue Corporation, and instead approve Verizon Avenue Corporation's DDEIF grant applications. Any other result would lead to a disparate and unfair application of standards that should be applied in the same manner as to all applicants.

Dated: June 5, 2006

Respectfully submitted,

Verizon Avenue Corporation

By:



John E. Rooney
Sonnenschein Nath & Rosenthal
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
jrooney@sonnenschein.com

A. Randall Vogelzang
Verizon
600 Hidden Ridge
Irving, Texas 75038
(972) 718-2170
randy.vogelzang@verizon.com

Deborah Kuhn
Verizon
205 North Michigan Avenue, 11th Floor
Chicago, Illinois 60601
(312) 260-3326
deborah.kuhn@verizon.com

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission
On Its Own Motion

9

1

1

Docket No. 06-0187

Grant Awards From Digital Divide Elimination Infrastructure Fund

1

9

STATE OF ILLINOIS

)

)

COUNTY OF McLEAN

)

VERIFICATION

Philip J. Wood Jr., being duly sworn, states on oath that he is Verizon's Vice President of Public Affairs, Policy & Communications for Illinois, and that the factual statements made in the foregoing "Verizon Avenue Corporation's Verified Initial Comments" are complete and accurate to the best of his knowledge, information and belief.

Philip J. Wood Jr.

Subscribed and sworn to before me this 31st day of May, 2006.



Mary Anderson

PUBLIC VERSION

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	Docket No. 06-0187
Grant Awards From Digital Divide)	
Elimination Infrastructure Fund)	

NOTICE OF FILING

Please take notice that on June 5, 2006, I caused "Verizon Avenue Corporation's Verified Initial Comments" in the above-captioned matter to be filed electronically with the Illinois Commerce Commission via its E-Docket system.


Deborah Kuhn

CERTIFICATE OF SERVICE

I, Deborah Kuhn, certify that I caused "Verizon Avenue Corporation's Verified Initial Comments," together with a Notice of Filing, to be served upon all parties on the attached service list on this 5th day of June, 2006, by electronic mail.


Deborah Kuhn

**ILLINOIS COMMERCE COMMISSION
DOCKET NO. 06-0187
SERVICE LIST**

Thomas Aridas
Administrative Law Judge
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle, Ste. C-800
Chicago, IL 60601
E-Mail: taridas@icc.illinois.gov

Ken Alberts
Director of Utilities
Rochelle Municipal Utilities
Northern Illinois Technology Triangle (NITT)
333 Lincoln Hwy.
PO Box 456
Rochelle, IL 61068
E-Mail: kalberts@rmu.net

Jason Bird
Superintendent of Electric
City of Princeton
Two S. Main St.
Princeton, IL 61356-1708
E-Mail: jbird@princeton-il.com

Aaron W. Brooks
Atty. for RocNet Holdings, LLC
Holmstrom & Kennedy PC
PO Box 589
800 N. Church St.
Rockford, IL 61103
E-Mail: abrooks@holmstromlaw.com

Brandy Bush Brown
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle, Ste. C-800
Chicago, IL 60601
E-Mail: bbrown@icc.illinois.gov

Ray Cagle
Chief Operating Officer
Delta Communications, LLC
d/b/a Clearwave Communications
2 N. Vine St.
Harrisburg, IL 62946-1561
E-Mail: rcagle@clearwave.com

Benjamin Clark
Project Manager
Verizon Avenue
12901 Worldgate Dr.
Herndon, VA 20170-6012
E-Mail: ben.clark@verizon.com

Dori Crow
Office Manager
Mt. Vernon.Net, Inc.
#1 Doctor's Park, Ste. H1
Mt. Vernon, IL 62864
E-Mail: dori@mvn.net

Douglas A. Dougherty
Illinois Telecommunications Association, Inc.
300 E. Monroe St., Ste. 306
PO Box 730
Springfield, IL 62705
E-Mail: ddougherty@ameritech.net

Troy A. Fodor
Atty. for Intervenor
Troy A. Fodor, P.C.
913 S. Sixth St.
Springfield, IL 62703
E-Mail: troyafodor@aol.com

E. M. Fulton Jr.
Atty. for Intervenor
Troy A. Fodor, P.C.
913 S. Sixth St.
Springfield, IL 62703

Bruce Giffin
General Manager
Illinois Rural Electric Cooperative
PO Box 80
Winchester, IL 62694
E-Mail: giffin@e-co-op.com

Barry Goodwin
Manager
USA Broadband-EI, LLC
607 S. State St.
Jerseyville, IL 62052-2366
E-Mail: barry@noww.us

William Harris
Electrical Commissioner
City of Sullivan
2 W. Harrison
Sullivan, IL 61951
E-Mail: wharris@sullivanil.us

Matthew L. Harvey
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle St., Ste. C-800
Chicago, IL 60601-3104
E-Mail: mharvey@icc.illinois.gov

ILLINOIS COMMERCE COMMISSION
DOCKET NO. 06-0187
SERVICE LIST

Nancy J. Hertel
Illinois Bell Telephone Company
Floor 25D
225 W. Randolph St.
Chicago, IL 60606
E-Mail: nw1783@sbcb.com

Karen Jackson-Furman
Director of Finance
Egyptian Internet Services, Inc.
1010 W. Broadway, PO Box 158
Steeleville, IL 62288-1312
E-Mail: kfurman@egyptian.net

Paul Jakubczak
Electrical Director
City of Rock Falls
1109 Industrial Park Rd.
Rock Falls, IL 61071
E-Mail: pjakubczak@rockfalls61071.com

Deborah Kuhn
Verizon
205 N. Michigan Ave., Ste. 1100
Chicago, IL 60601
E-Mail: deborah.kuhn@verizon.com

W. James Lally
Chief Financial Advisor
ROC-Net Holdings, LLC
605 Fulton Ave.
Rockford, IL 61103
E-Mail: jlally@eigerlab.org

Ben Moore
Owner
Yamaha of Southern Illinois
3008 S. Park Ave.
Herrin, IL 62948-3721
E-Mail: benmoore@yamahaofsi.com

Stephen J. Moore
Atty. for RocNet Holdings, LLC
Rowland & Moore LLP
200 W. Superior St., Ste. 400
Chicago, IL 60610
E-Mail: steve@telecomreg.com

Dennis K. Muncy
Atty. for Egyptian Internet Services, Inc.
Meyer Capel, a Professional Corporation
306 W. Church St.
PO Box 6750
Champaign, IL 61826-6750
E-Mail: dmuncy@meyercafel.com

Joseph D. Murphy
Atty. for Egyptian Internet Services, Inc.
Meyer Capel, a Professional Corporation
306 W. Church St.
PO Box 6750
Champaign, IL 61826-6750
E-Mail: jmurphy@meyercafel.com

Mark Ortlieb
Illinois Bell Telephone Company
25D
225 W. Randolph
Chicago, IL 60606
E-Mail: mo2753@sbcb.com

Pat Quinn
Lieutenant Governor
State of Illinois
100 W. Randolph, Ste. 15-200
Chicago, IL 60601-3220
E-Mail: pat_quinn@ltgov.state.il.us

Kevin D. Rhoda
Atty. for RocNet Holdings, LLC
Rowland & Moore LLP
200 W. Superior St., Ste. 400
Chicago, IL 60610
E-Mail: krhoda@telecomreg.com

John E. Rooney
Sonnenschein Nath & Rosenthal LLP
233 S. Wacker Dr
Chicago, IL 60606
E-Mail: jrooney@sonnenschein.com

Thomas Rowland
Atty. for RocNet Holdings, LLC
Rowland & Moore LLP
200 W. Superior St., Ste. 400
Chicago, IL 60610
E-Mail: tom@telecomreg.com

**ILLINOIS COMMERCE COMMISSION
DOCKET NO. 06-0187
SERVICE LIST**

Raymond Sinclair
President
Sincsurf, Inc
1665 S. State St.
Jerseyville, IL 62052-3609
E-Mail: ray@sincsurf.net

Gary L. Smith
Atty. for Delta Communications, LLC,
d/b/a Clearwave Communications
Loewenstein, Hagen & Smith, P.C.
1204 S. Fourth St.
Springfield, IL 62703-2229
E-Mail: lexsmith@lhoslaw.com

Robert L. Stivers
Chief Financial Officer
Aero Communications, LLC
Heartland Communications Internet Services, Inc.
1301 Broadway, Ste. 101
Paducah, KY 42001
E-Mail: rstivers@hcis.net

A. Randal Vogelzang
Verizon Services Group
600 Hidden Ridge
Irving, TX 75038
E-Mail: randy.vogelzang@verizon.com

Peter Wagner
Case Manager
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701
E-Mail: pwagner@icc.illinois.gov

Philip J. Wood Jr.
Vice President
Public Affairs Policy & Communications
Verizon
1312 E. Empire St., ILLARA
PO Box 2955
Bloomington, IL 61702
E-Mail: philip.j.wood.jr@verizon.com

Donald L. Woods
Atty. for Illinois Telecommunications Association
2033 Lindsay Rd.
Springfield, IL 62704
E-Mail: ifimhome@aol.com